

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE TREMONT SECURITIES LAW,
STATE LAW AND INSURANCE
LITIGATION

Master File No.: 08-CV-11117 (TPG)

**DECLARATION OF
LISA M. BUCKLEY, ESQ. IN
OPPOSITION TO PLAINTIFFS'
SETTLEMENT CLASS
COUNSEL'S MOTION**

THIS DOCUMENT RELATES TO: ALL
ACTIONS

I, LISA M. BUCKLEY, hereby declare as follows:

1. I am admitted to this Court and am a member of Pryor Cashman LLP, counsel for Antonio G. Calabrese ("Plaintiff") in the above-captioned action. I submit this declaration in opposition to Plaintiffs' Settlement Class Counsel's ("Class Counsel") Motion for Approval of Fund Distribution Account Plan of Allocation, Distribution Procedures, Attorneys' Fees and Reimbursement Expenses ("Motion") and for the purpose of putting into the record before the Court certain documents which are referred to in the accompanying memorandum of law in opposition to Class Counsel's Motion. I am fully familiar with the facts alleged herein.

2. Attached hereto as Exhibit A is a true and correct copy of a settlement agreement filed on July 28, 2011 (ECF No. 17-1) in the adversary proceeding captioned *Picard v. Tremont Group Holdings, et al.*, Adv. Pro. No. 10-05310 (BRL) (Bankr. S.D.N.Y.).

3. Attached hereto as Exhibit B is a true and correct copy of a September 22, 2011 hearing transcript filed on September 26, 2011 (ECF No. 39) in the adversary proceeding captioned *Picard v. Tremont Group Holdings, et al.*, Adv. Pro. No. 10-05310 (BRL) (Bankr. S.D.N.Y.).

4. Attached hereto as Exhibit C is a true and correct copy of a BloombergBusiness article by Linda Sandler, dated November 8, 2012, entitled "Fortress Credit Buys \$2 Billion in Madoff Claims From Rye Fund" (<http://www.bloomberg.com/news/articles/2012-11-08/fortress-credit-buys-2-billion-in-madoff-claims-from-rye-fund>).

5. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: New York, New York
August 10, 2015

/s/ Lisa M. Buckley
LISA M. BUCKLEY